

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

<p>CHARLENE CARTER,</p> <p style="text-align: center;">Plaintiff,</p> <p>V.</p> <p>SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil Case No. 3:17-cv-02278-X</p>
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**DECLARATION OF MATTHEW B. GILLIAM
IN SUPPORT OF PLAINTIFF CHARLENE CARTER’S BILL OF COSTS AND
MOTION FOR ATTORNEYS’ FEES, COSTS, AND EXPENSES FOR MOTION-FOR-
CONTEMPT AND MOTION-TO-COMPEL PROCEEDINGS**

I, Matthew B. Gilliam, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I submit this declaration in support of Plaintiff Charlene Carter’s (“Plaintiff”) Bill of Costs and Motion for Attorneys’ Fees, Costs, and Expenses for the motion-for-contempt and motion-to-compel proceedings. I have served as Plaintiff’s counsel since 2017. The facts stated in this Declaration are within my personal knowledge.

2. **Education:** I received my B.A. degree in Political Science and Spanish from Transylvania University in 1999, graduating *magna cum laude*. I graduated from the Georgetown University Law Center in Washington, D.C., with a J.D. in 2011.

3. **Employment History:** Since April 2014, I have been employed full-time as a salaried staff attorney by the National Right to Work Legal Defense Foundation, Inc. (“Foundation”), 8001 Braddock Road, Suite 600, Springfield, Virginia, 22151, which is a

nonprofit, charitable public interest organization that provides free legal aid to employees and is exempt from taxation under 26 U.S.C. § 501(c)(3).¹ In that capacity, I have acquired trial court and appellate experience in the fields of constitutional, civil rights, labor relations, and administrative law. As a Foundation staff attorney, my primary duties are to provide free legal aid to individual employees to protect their statutory and constitutional rights from abuses arising from compulsory unionism arrangements between employers and labor organizations, and to obtain relief for employees who have suffered from such abuses in federal and state courts and administrative tribunals. I provide my legal services exclusively on behalf of or for the benefit of employees.

4. **Relevant Practice Experience:** As a Foundation staff attorney, I practice trial and appellate litigation exclusively on behalf of or for the benefit of individual employees in the areas of constitutional, civil rights, and labor law. I have been and/or am currently counsel in the cases below. Most of the cases concerned questions regarding compulsory union fees and protecting the rights of employees who are required to pay such fees. These also include cases where I represented employee plaintiffs claiming discrimination and retaliation for exercising protected rights to oppose unions.

- a. *Martin v. Local 556, Transp. Workers of Am.*, 708 F. App'x 171 (5th Cir. 2017).
- b. *Martin v. Transp. Workers of Am., Local 556*, 206 F. Supp. 3d 1227 (N.D. Tex. Aug. 29, 2016).
- c. *Bahreman v. Allegiant Air, L.L.C. & Transp. Workers Union of Am. Local 577*, 2:20-cv-00437-ART-DJA (D. Nev. filed Mar. 2, 2020).
- d. *Carter v. Southwest Airlines Co., and Transp. Workers Union of Am. Local 556*, No. 3:17-CV-2278-X (N.D. Tex. filed Aug. 25, 2017).
- e. *Cruz v. Unión Independiente Auténtica*, No. 3:17-CV-02261-PAD (D.P.R. filed Oct. 26, 2017).

¹ *Nat'l Right to Work Legal Def. & Educ. Found., Inc. v. United States*, 487 F. Supp. 801 (E.D. N.C. 1979).

- f. *Cimalore v. Town of Westerly*, No. 1:15-CV-00313-WES (D.R.I. Feb. 6, 2020).
- g. *Koza v. Town of Westerly*, No. 1:15-CV-00315-WES (D.R.I. Sep. 18, 2020).
- h. *Ferrigno v. Town of Westerly*, No. 1:18-CV-00186-WES (D.R.I. Sep. 18, 2020).
- i. *Sarauer v. Int'l Ass'n of Machinists and Aerospace Workers Dist. No. 10*, 966 F.3d 661 (7th Cir. 2020).
- j. *Sarauer v. Int'l Ass'n of Machinists and Aerospace Workers Dist. No. 10*, No. 2:16-CV-00361-DEJ, 2017 WL 8727854 (E.D. Wis. Mar. 31, 2017).
- k. *Lightsey v. Amalgamated Transit Union, Local 1733*, No. 2:16-CV-01484-PP (E.D. Wis. April 27, 2017).
- l. *West Virginia AFL-CIO v. Justice*, 16-C-959-9569 (W. Va. Cir. Ct. Kanawha Co. Feb. 27, 2019) (*amicus* brief).
- m. *Morrisey v. West Virginia AFL-CIO*, 239 W. Va. 633, 804 S.E.2d 833, No. 17-0187 (W. Va. 2017) (*amicus* brief).
- n. *Justice v. West Virginia AFL-CIO*, 246 W. Va. 205, 866 S.E.2d 613, No. 21-0559 (W. Va. 2021) (*amicus* brief).

5. As a Foundation staff attorney, I regularly practice on behalf of or for the benefit of individual employees by representing them in unfair labor practice charges filed at the National Labor Relations Board, and assisting them with decertification and deauthorization petitions.

6. **Bar Admissions:** I am an active member in good standing of the New York State Bar and the West Virginia State Bar, having been admitted in 2012 and 2013 respectively. I am also admitted to practice before the following federal courts, with the year of admission shown in parentheses: United States Supreme Court (2018); U.S. Court of Appeals, Fifth Circuit (2016); U.S. Court of Appeals, Seventh Circuit (2019); U.S. District Court for the Eastern District of Wisconsin (2016); U.S. District Court for the Southern District of West Virginia (2013).

7. Attached hereto and incorporated herein are true and correct copies of the following documents which support Plaintiff's Bill of Costs and Proof of Attorneys' Fees and Expenses:

Exhibit 1 is a chart that catalogs the hours I expended on matters related to motion-for-contempt and motion-to-compel proceedings against Southwest; **Exhibit 2** is a chart that catalogs and verifies the necessary expenses the Foundation expended on those matters. This is in addition to the expenses paid by Pryor & Bruce that were reimbursed by the Foundation, and which are detailed in Bobby G. Pryor's declaration.

With regard to the chart of the hours I spent on this matter (**Exhibit 1**), I am required by my employer, and it is and has been my practice, to maintain daily contemporaneous time sheets accounting for my activities on a case-by-case basis (without regard to whether a fee recovery is possible), and which are entered directly into the Foundation's database system. The work I perform in each case is recorded in 1/10 of an hour increments. The chart in **Exhibit 1** is completely derived from my personal time entries.

For that chart (**Exhibit 1**), I downloaded all of my time entries from the Foundation's system for December 20, 2022 through the present, and converted the downloaded file into an Excel spreadsheet. I added an "Actual Time" column that combines the "Actual Hours" and "Actual Minutes" into a single time value for Gilliam's chart. The "Actual Amount" column shows Gilliam's "Actual Time" for that entry multiplied by the hourly rate claimed in the petition (\$350). I added columns to Gilliam's chart for "Time Sought," "Amount Sought," and "n/c" (nonchargeable) to identify time excluded in the interest of billing judgment. Then I redacted privileged and confidential information for entries unrelated to the motion-for-contempt and motion-to-compel proceedings. Carter does not seek time for any redacted entry.

Exhibit 2 is a chart showing all expenses directly incurred and paid by the Foundation and its attorneys in the motion-for-contempt and motion-to-compel proceedings, but excludes those expenses incurred by Pryor & Bruce and later reimbursed to them by the Foundation. I am required

by my employer, and it is and has been my practice, to maintain daily contemporaneous records of necessary expenditures related to this case, which are entered directly into my employer's database system. Thus, the chart in **Exhibit 2** is derived from my personal expense reports.

For the expenses chart (**Exhibit 2**), I downloaded all expenses incurred and paid by the Foundation and its attorneys in this matter for December 20, 2022 through the present, excluding costs and expenses incurred by Pryor & Bruce and later reimbursed to them by the Foundation. I converted the downloaded file into an Excel spreadsheet, and added columns for the "Amount Sought" and "n/c" (nonchargeable) to identify expenses excluded in the interest of billing judgment.

8. As **Exhibit 1** demonstrates, I spent a total of 381.8 hours on the motion-for-contempt and motion-to-compel proceedings. I bolded the tasks that I performed for those matters, included the corresponding time in the "Time Sought" column, and excluded any time marked on the attachment as "n/c" (for nonchargeable) in the exercise of billing judgment. I am seeking compensation for 342.1 of the hours I expended. I excluded 39.7 hours of my time in the exercise of billing judgment. As part of these reductions, I excluded 11.1 hours for time spent addressing reinstatement concerns that, ultimately, Carter did not address in the motion-for-contempt and motion-to-compel proceedings. I also excluded 28.6 hours for travel time between Springfield, Virginia and Dallas, Texas, for show cause hearings. I hereby state that all time set forth on the attached list for which compensation is claimed was reasonably and necessarily expended on this matter.

9. The Foundation seeks compensation for \$3,335.40 in expenses expended on Carter's behalf in the motion-for-contempt and motion-to-compel proceedings, including \$3,194.72 in expenses set forth in **Exhibit 2** to my declaration, and \$140.68 in expenses set forth

in **Exhibit 3** to Pryor's declaration. The expenditures in **Exhibit 2** to my declaration for which compensation is sought are derived from the Cash and Credit Expense Reports submitted by me on a monthly basis for months in which expenditures were made in the motion-for-contempt and motion-to-compel proceedings. I hereby state that all expenses set forth in **Exhibit 2**, and for which compensation is sought, were reasonably and necessarily expended on these matters. I have excluded \$505 in unrelated expenses.

10. The Foundation reimbursed and/or paid Pryor & Bruce for all of the expenses and fees identified in **Exhibit 1** to Pryor's declaration.

11. The Foundation is providing Carter with free legal aid (i.e., all of the funding for her case). Pursuant to Carter's Retainer Authorization, the Foundation is entitled to any attorneys' fees, expenses, or costs that opposing parties are ordered to pay.

I swear under penalty of perjury that the foregoing is true and correct.

DATED: August 21, 2023

/S/ MATTHEW B. GILLIAM
Matthew B. Gilliam

EXHIBIT 1

Date	User	Description	Actual Hours	Actual Minutes	Actual Time	Actual Amount	Time Sought	Amount Sought	n/c
12/20/2022	Gilliam, Matt B	Communicating with Paulo McKeeby re post judgment interest rate for supersedeas bond (.1); discussing same issue with co counsel MDH (.1); researching same (.2); reviewing SWA and Local 556 notices sent to employees (.6) ; sending emails to Paulo McKeeby and Adam Greenfield re payments of sanction fees to NRTW (.1)	1	6	1.1	\$385.00	0.6	\$210.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
12/21/2022	Gilliam, Matt B	Communicating with client and co counsel re SWA notices to FAs and communicating re potential sanctions motion (1.2); reviewing SWA and Local 556 notices sent to employees (1.4) ; preparing and filing notice of invoice error (.7); communicating with client re reinstatement issues (1.0)	4	18	4.3	\$1,505.00	2.6	\$910.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
12/22/2022	Gilliam, Matt B	Preparing and emailing letter to SWA re sanctions motion for failure to comply with court order, including communications with client and co counsel re letter, incorporating co counsel edits and comments	8	36	8.6	\$3,010.00	6	\$2,100.00	n/c- 2.6 hours (30% reduction for work spent addressing reinstatement concerns)
12/26/2022	Gilliam, Matt B	Preparing sanctions motion for SWA failure to comply with court order	8	18	8.3	\$2,905.00	5.8	\$2,030.00	n/c- 2.5 hours (30% reduction for work spent addressing reinstatement concerns)
12/27/2022	Gilliam, Matt B	Preparing sanctions motion for SWA failure to comply with court order, including communications with co counsel re motion, incorporating co counsel edits and comments	10	48	10.8	\$3,780.00	7.6	\$2,660.00	n/c- 3.2 hours (30% reduction for work spent addressing reinstatement concerns)
12/28/2022	Gilliam, Matt B	Preparing sanctions motion for SWA failure to comply with court order, including communications with client re motion, incorporating co counsel edits and comments; preparing client declaration in support of motion ; preparing docs re reinstatement to send to Paulo to avoid protective order issues; reviewing SWA response letter and modifying motion based on SWA response; communicating with co counsel re SWA response letter and edits to motion	6	6	6.1	\$2,135.00	4.2	\$1,470.00	n/c- 1.9 hours (30% reduction for work spent addressing reinstatement concerns)

12/29/2022	Gilliam, Matt B	Revising sanctions motion for SWA failure to comply with court order, including edits based on SWA response letter, communications with client and co counsel re motion, incorporating co counsel comments; editing client declaration based on client comments; communicating with client re declaration and reinstatement; incorporating RAV argument re SWA free speech claims in response letter	11	54	11.9	\$4,165.00	11.6	\$4,060.00	n/c- .3 hour reduction for time addressing reinstatement issues with client
12/30/2022	Gilliam, Matt B	Revising, finalizing, and filing sanctions motion for SWA failure to comply with court order, including edits to motion and client declaration based on SWA provision of industry recommended training regs and incorporating further co counsel edits and comments (2.0); communicating with SWA attorney PM re industry recommended training regs (.1); reviewing SWA documents re industry recommended training regs (.4); communicating with SWA attorney PM re Rule 50 and Rule 59 Motion (.1); communicating with L556 attorney re nature and details of union intent to join swa supersedeas bond motion, including drafting and revising emails re same (.6); communicating with co counsel MDH re same (.4)	3	36	3.6	\$1,260.00	1.4	\$490.00	n/c- .6 hours (30% reduction to 2.0 hours spent editing motion and client declaration based on SWA provision of industry recommended training regs; all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/01/2023	Gilliam, Matt B	Reviewing court orders on supersedeas bond and sanctions motion briefing schedule (.1); downloading and reviewing fifth circuit forms, rules, and practitioners guide (.1)	0	12	0.2	\$70.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/02/2023	Gilliam, Matt B	Conversations with MDH re court orders on supersedeas bond and sanctions motion briefing schedule	0	6	0.1	\$35.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/03/2023	Gilliam, Matt B	Communicating with BGP re SWA R50 R59 motion (.1); communicating with legal director RJL re SWA R50 R59 motion and FRAP 4(A) (.2); communicating with client re SWA R50 R59 motion (.1); reviewing court order re costs taxed and communications with local counsel re same (.1); communicating with MDH and L556 counsel re L556 bond motions, calculating union supersedeas amounts, applying post judgment interest to union amounts and reviewing union motion and language (2.0)	2	30	2.5	\$875.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

01/04/2023	Gilliam, Matt B	Communicating with SWA counsel PM, MDH, and BGP re supersedeas motion (.1); conferring with L556 counsel AG re supersedeas motion content and bond filing (.2); emailing legal director RJL re L556 supersedeas bond motion and L556 notice of appeal (.4)	0	42	0.7	\$245.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/05/2023	Gilliam, Matt B	Reading SWA R50 R59 motion and outlining response	2	24	2.4	\$840.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/06/2023	Gilliam, Matt B	Reading SWA R50 R59 motion and outlining response	4	6	4.1	\$1,435.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/07/2023	Gilliam, Matt B	Reading SWA response to sanctions motion; outlining reply; reviewing RAV and other cases re speech and injunctions	9	36	9.6	\$3,360.00	9.6	\$3,360.00	
01/08/2023	Gilliam, Matt B	Outlining and drafting sanctions motion reply	11	36	11.6	\$4,060.00	11.6	\$4,060.00	
01/10/2023	Gilliam, Matt B	Writing and revising sanctions motion reply	9	18	9.3	\$3,255.00	9.3	\$3,255.00	
01/11/2023	Gilliam, Matt B	Writing, revising, and filing sanctions motion reply	10	42	10.7	\$3,745.00	10.7	\$3,745.00	
01/13/2023	Gilliam, Matt B	Reading SWA response to Carter attorneys fees motion and outlining reply (4.1); preparing checklist of tasks to be completed and reviewing deadlines (.2)	4	18	4.3	\$1,505.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/14/2023	Gilliam, Matt B	Reading SWA response to Carter attorneys fees motion and outlining reply (.4); reading L556 response to Carter attorneys fees motion and outlining reply (1.4); reviewing Fifth Circuit Court of Appeals rules and procedures (.3); analyzing Fifth Circuit rules, procedures, and caselaw [REDACTED] and drafting motion to hold appeal in abeyance (6.3)	8	24	8.4	\$2,940.00	0	\$0.00	n/c- all redacted entries and entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/15/2023	Gilliam, Matt B	Outlining and drafting title vii and arbitration sections of Carter Response Brief to SWA R50 R59 motion	12	54	12.9	\$4,515.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

01/16/2023	Gilliam, Matt B	Writing Carter attorneys fees motion reply to SWA (5.9); drafting Carter Response Brief to SWA R50 R59 motion (2.5); writing and revising court of appeals motion to hold L556 appeal in abeyance (2.3)	10	42	10.7	\$3,745.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/17/2023	Gilliam, Matt B	Writing Carter Response Brief to SWA R50 R59 motion (7.9); reviewing, revising, and filing court of appeals motion to hold L556 appeal in abeyance (3.4)	11	18	11.3	\$3,955.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/18/2023	Gilliam, Matt B	Writing and revising Carter attorneys fees motion reply to SWA (10.2); adding certificate of compliance and resubmitting to court of appeals motion to hold L556 appeal in abeyance (.5)	10	42	10.7	\$3,745.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/19/2023	Gilliam, Matt B	Writing and revising Carter Response Brief to SWA R50 R59 motion	12	24	12.4	\$4,340.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/20/2023	Gilliam, Matt B	Communicating with MDH re Carter Response Brief to SWA R50 R59 motion (.3); revising Carter reply to SWA response to attorneys fees motion (6.8); outlining and writing Carter reply to L556 response to attorneys fees motion (2.0)	9	6	9.1	\$3,185.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/21/2023	Gilliam, Matt B	Revising Carter Response Brief to SWA R50 R59 motion and incorporating record citations, drafting response, and drafting proposed order (8.3); reviewing and incorporating citations to Carter reply to SWA response to attorneys fees motion (5.0)	13	18	13.3	\$4,655.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/22/2023	Gilliam, Matt B	Revising Carter Response Brief to SWA R50 R59 motion and incorporating record citations (9.8); reviewing and revising Carter reply to SWA response to attorneys fees motion (1.0); reviewing and revising Carter reply to L556 response to attorneys fees motion (1.8)	12	36	12.6	\$4,410.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/23/2023	Gilliam, Matt B	Reviewing, revising, finalizing, and filing Carter Response Brief to SWA R50 R59 motion and incorporating record citations and evidence (9.0); reviewing, revising, finalizing, and filing Carter reply to SWA response to attorneys fees motion (3.0); reviewing, revising, finalizing, and filing Carter reply to L556 response to attorneys fees motion (2.0)	14	0	14	\$4,900.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

01/24/2023	Gilliam, Matt B	Communicating with client re case filings and updates	0	54	0.9	\$315.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/25/2023	Gilliam, Matt B	Reviewing fifth circuit court of appeals rules, procedures, and instructions re preparing transcript and appellee obligations	1	12	1.2	\$420.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/26/2023	Gilliam, Matt B	Reviewing FRAP, fifth circuit court of appeals rules, procedures, and instructions (1.8); reviewing L556 exhibits filings at district court (2.0)	3	48	3.8	\$1,330.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
01/27/2023	Gilliam, Matt B	Reviewing fifth circuit court of appeals order re limited remand	0	30	0.5	\$175.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
02/01/2023	Gilliam, Matt B	Reviewing issues with filed document to make sure information is unavailable on the public docket; contacting CM ECF help desk; remailing BGP and MDH	1	18	1.3	\$455.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
02/07/2023	Gilliam, Matt B	Reviewing SWA Reply re JMOL New Trial Motion	0	36	0.6	\$210.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
02/10/2023	Gilliam, Matt B	Communicating with client re status of case	0	6	0.1	\$35.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
02/22/2023	Gilliam, Matt B	[REDACTED]	1	0	1	\$350.00	0	\$0.00	n/c- all redacted entries unrelated to motion-to-compel or motion-for-contempt proceedings
03/08/2023	Gilliam, Matt B	Communications with client re status of case	0	24	0.4	\$140.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

04/03/2023	Gilliam, Matt B	Reviewing SWA updated social media policies	0	24	0.4	\$140.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
04/10/2023	Gilliam, Matt B	Reviewing Court order setting show cause hearing and requiring discovery; communicating with client and co counsel re order	0	30	0.5	\$175.00	0.5	\$175.00	
04/11/2023	Gilliam, Matt B	Communicating with BGP re show cause hearing order	0	18	0.3	\$105.00	0.3	\$105.00	
04/21/2023	Gilliam, Matt B	[REDACTED]	0	18	0.3	\$105.00	0	\$0.00	n/c- all redacted entries unrelated to motion-to-compel or motion-for-contempt proceedings
04/24/2023	Gilliam, Matt B	Reviewing Court order denying Southwest motion for new trial; communicating to client and co counsel re Court decision	1	54	1.9	\$665.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
04/26/2023	Gilliam, Matt B	Researching attorney client privilege cases re SWA burden to show that the privilege log asserts sufficient information to assert the privilege	0	30	0.5	\$175.00	0.5	\$175.00	
04/27/2023	Gilliam, Matt B	Reviewing appeals deadlines (.6); outlining brief re compelling production of documents for which attorney client privilege is asserted (.7); researching attorney client privilege and the crime fraud exception (3.9)	5	12	5.2	\$1,820.00	4.6	\$1,610.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
04/28/2023	Gilliam, Matt B	Analyze subpoena issues and plans to serve subpoenas to witnesses for show cause hearing (.1); researching cases re the standard for reviewing purportedly privileged documents in camera (.8); researching crime fraud exception cases related to court order violations (.4); drafting motion and brief to compel production of documents for which privilege is asserted (2.9); reviewing documents and filings related to sanctions motion (1.2); reviewing subpoena rules (.7); reviewing deadlines for filing Carter cross appeal (.6); reviewing Southwest show cause document production and analyzing SWA privilege log (2.0); outlining and organizing arguments and objections to privilege log and privilege claims for motion to compel brief (1.7)	10	24	10.4	\$3,640.00	10.4	\$3,640.00	
04/29/2023	Gilliam, Matt B	Drafting motion and brief to compel show cause hearing documents for which SWA asserts privilege	3	36	3.6	\$1,260.00	3.6	\$1,260.00	
04/30/2023	Gilliam, Matt B	Drafting motion and brief to compel show cause hearing documents for which SWA asserts privilege	8	42	8.7	\$3,045.00	8.7	\$3,045.00	

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05/01/2023	Gilliam, Matt B	Preparing and sending information to legal assistant to prepare subpoenas for SWA and Local 556 witnesses to attend show cause hearing (1.3); revising motion and brief to compel SWA show cause hearing documents for which SWA asserts privilege (.3); communications with MLC re Carter appeals (.6); phone call with MDH and BGP re subpoenas, show cause hearing, and motion to compel (.9); preparing list of issues to discuss with SWA counsel PM prior to filing motion to compel (2.0); emailing PM and BM to schedule meeting (.1)	5	12	5.2	\$1,820.00	4.6	\$1,610.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
05/02/2023	Gilliam, Matt B	Revising motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege (6.5); phone call conference with SWA counsel PM and BM and with MDH re privilege log issues and objections (.9); drafting list of issues and objections discussed during meeting to send to PM and BM (.5)	7	54	7.9	\$2,765.00	7.9	\$2,765.00	
05/03/2023	Gilliam, Matt B	Revising and editing motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege, including preparation of certificate of conference (11.7); emailing SWA counsel PM and BM re privilege log issues and objections (.2)	11	54	11.9	\$4,165.00	11.9	\$4,165.00	
05/04/2023	Gilliam, Matt B	Revising and editing motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege, including preparing proposed order and appendix and incorporating citations	14	6	14.1	\$4,935.00	14.1	\$4,935.00	
05/05/2023	Gilliam, Matt B	Revising, editing, finalizing, and filing motion and brief to compel SWA to produce show cause hearing documents for which it asserts privilege, including revising certificate of conference and reviewing table of contents and authorities	12	36	12.6	\$4,410.00	12.6	\$4,410.00	
05/06/2023	Gilliam, Matt B	Communicating with client re filings and show cause hearing proceedings (1.5) and appeals (.5)	2	0	2	\$700.00	1.5	\$525.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
05/08/2023	Gilliam, Matt B	Reviewing and revising notice of appeal (.6); revising and updating subpoenas for SWA witnesses to attend show cause hearing (1.3); drafting emails to SWA and L556 counsel re accepting service and communications with MDH re same (2.0); reviewing BGP communications re appeal (.1)	4	0	4	\$1,400.00	3.3	\$1,155.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

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05/09/2023	Gilliam, Matt B	Researching for motion and brief to compel witnesses to attend show cause hearing based on SWA refusal to coordinate service of subpoenas (.3); drafting motion to compel SWA witnesses to attend show cause hearing based on SWA refusal to coordinate service of subpoenas (2.0); revising motion to compel witnesses with local counsel edits (.4); drafting email to SWA counsel PM re coordinating service of subpoenas and communications with co counsel and SWA counsel PM re same (.7); communications with BGP and client re [REDACTED] (1.0)	4	24	4.4	\$1,540.00	3.4	\$1,190.00	n/c- all redacted entries unrelated to motion-to-compel or motion-for-contempt proceedings
05/10/2023	Gilliam, Matt B	Revising, finalizing, and filing motion to compel SWA witnesses to attend show cause hearing, including preparing appendix, exhibits, and proposed order	3	30	3.5	\$1,225.00	3.5	\$1,225.00	
05/14/2023	Gilliam, Matt B	Drafting Carter motion for leave to respond to Southwest May 12 Brief re Sanctions (9.7); phone call with BGP re show cause hearing and SWA brief (.6)	10	18	10.3	\$3,605.00	10.3	\$3,605.00	
05/15/2023	Gilliam, Matt B	Revising, finalizing, and filing Carter motion for leave to respond to Southwest May 12 Brief re Sanctions (3.7); preparing brief responding to SWA May 12 Brief re Sanctions (5.8)	9	30	9.5	\$3,325.00	9.5	\$3,325.00	
05/16/2023	Gilliam, Matt B	Revising and incorporating local counsel edits to Carter brief responding to SWA May 12 Brief re Sanctions (4.5); reviewing Court order re show cause hearing and religious liberty training (.5); communications with BGP re Court orders (.3); communicating with MDH re plans for serving subpoenas (.2); revising subpoenas for service (1.1); emailing TWU Local 556 counsel re subpoena issues (.1)	6	42	6.7	\$2,345.00	6.7	\$2,345.00	
05/17/2023	Gilliam, Matt B	Reviewing cases and filings and outlining issues to address in preparation for show cause hearing (4.1); phone call with MDH and BGP re show cause hearing planning and strategies (.8); emailing SWA counsel PM re Carter position on SWA motion for leave to file brief re religious liberty training (.1); emailing TWU Local 556 counsel EC and AG to schedule meeting about SWA communications re court decision notice (.4)	5	24	5.4	\$1,890.00	5.4	\$1,890.00	

05/18/2023	Gilliam, Matt B	Communicating with TWU Local 556 counsel AG and EC re SWA communications re court decision notice and planning for conference with AG and EG re same (.1); revising Carter response to SWA May 12 Brief re Show Cause hearing (5.7); communications with MDH re meeting with L556 counsel AG and EC before meeting (.3); phone conference with L556 counsel AG and EC re SWA communications about court decision notice (.5); reading and analyzing SWA Court ordered responsive brief re witnesses (1.4); reading and analyzing Court order re SWA brief and witnesses for show cause hearing (.4)	8	24	8.4	\$2,940.00	8.4	\$2,940.00	
05/19/2023	Gilliam, Matt B	Revising, finalizing, and filing Carter brief in response to SWA May 12 brief re show cause hearing (6.7); communicating with client re court orders and rulings and party filings re show cause hearing (.3)	7	0	7	\$2,450.00	7	\$2,450.00	
05/20/2023	Gilliam, Matt B	Outlining and writing response to SWA religious liberty training bench brief	10	0	10	\$3,500.00	10	\$3,500.00	
05/21/2023	Gilliam, Matt B	Traveling from Alexandria VA to Dallas for show cause hearing (6.0); reviewing cases and filings and outlining sanctions to discuss for show cause hearing (2.1); drafting Carter response to SWA brief re religious liberty training (8.1)	16	12	16.2	\$5,670.00	10.2	\$3,570.00	n/c- 6.0 hours for travel
05/22/2023	Gilliam, Matt B	Reviewing cases and filings and outlining sanctions to discuss for show cause hearing (5.3); phone meetings with BGP and MDH to discuss show cause hearing planning and strategies (1.8); revising, finalizing, and filing Carter response to SWA brief re religious liberty training (4.4); reviewing planning and rules re filing Carter cross appeal (.7); communicating with client re show cause hearing (.2); reviewing and analyzing TWU Local 556 production of communications with SWA re recent court decision notice and communicating with MDH re same (.8)	13	12	13.2	\$4,620.00	12.5	\$4,375.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
05/23/2023	Gilliam, Matt B	Reviewing cases and filings and organizing presentation re appropriate sanctions for show cause hearing (7.4); attending show cause hearings (3.3); finalizing and filing notice of appeal and communications with co counsel and client re same (1.0)	11	42	11.7	\$4,095.00	10.7	\$3,745.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
05/24/2023	Gilliam, Matt B	Travel from Dallas (5.4); communicating with SWA counsel to coordinate dates for continuing show cause hearing (.5); reviewing SWA counsel notices of appearances in appeal (.5); communicating with BGP re show cause hearing and issues for next hearing (.6)	7	0	7	\$2,450.00	1.1	\$385.00	n/c- 5.4 hours for travel; all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

05/25/2023	Gilliam, Matt B	Communicating with SWA counsel AR re coordinating dates and issues for continuing show cause hearing (.5); communicating with local counsel MDH re same (.2); communicating with BGP re show cause hearing and issues for next hearing (.4)	1	6	1.1	\$385.00	1-1	\$385.00	
05/30/2023	Gilliam, Matt B	Reviewing Court of Appeals docketing letter (.4); contacting clerk re procedure for consolidating cases (.1); drafting motion to consolidate cases (4.2)	4	42	4.7	\$1,645.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
05/31/2023	Gilliam, Matt B	Drafting motion to consolidate cases and researching consolidation motions filed in other fifth circuit cases	10	12	10.2	\$3,570.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/01/2023	Gilliam, Matt B	Reviewing motion to consolidate appeals (3.0); reviewing hearing transcripts for appeal and appellate rules re transcripts (3.4)	6	24	6.4	\$2,240.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/02/2023	Gilliam, Matt B	Researching and outlining standards for appellate review (2.9); conferring with SWA and L556 counsel re motion to consolidate appeals (.2); discussing appeal logistics and rules with MLC (1.1); reviewing transcript order procedures and rules and verifying transcript order needs (.4); revising motion to consolidate appeals (.6); reviewing fifth circuit mediation program correspondence and procedures (.3); reviewing Judge Starr AI filing requirement (.4); emailing counsel re coordinating dates for continuing show cause hearing (.1)	6	0	6	\$2,100.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/05/2023	Gilliam, Matt B	Filing certification re Judge Starr AI requirements (.1); reading SWA counsel Andrew Ryan emails re show cause hearing and coordinating dates and hearing logistics (.3) ; revising transcript order form (.8); revising motion to consolidate appeals (.5)	1	42	1.7	\$595.00	0.3	\$105.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/06/2023	Gilliam, Matt B	Communicating with SWA appellate counsel re appeal logistical issues and consolidating appeals (.4); drafting letter to clerk re consolidation of appeals (1.4); reviewing consolidation letter and fifth circuit rules (1.9)	3	42	3.7	\$1,295.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

06/07/2023	Gilliam, Matt B	Reviewing SWA appellate counsel edits to consolidation letter to clerk and respond (1.3); filing consolidation letter (.7)	2	0	2	\$700.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/08/2023	Gilliam, Matt B	Communications with SWA and L556 appellate counsel re motion to consolidate appeals (.1); revising consolidation motion (1.9)	2	0	2	\$700.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/09/2023	Gilliam, Matt B	Communicating with SWA and L556 appellate counsel and co counsel re draft and edits to motion to consolidate appeals (.8); finalizing and filing unopposed motion to consolidate appeals (.4); communicating with co counsel re filing notices of appearance in cross appeal (.2)	1	24	1.4	\$490.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/12/2023	Gilliam, Matt B	Communicating with client and co counsel re appellate court mediation program and mediation (1.9); communicating with co counsel re notice of appearance in cross appeal (.1); reviewing transcript rules (.2)	2	12	2.2	\$770.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/14/2023	Gilliam, Matt B	Reviewing and preparing transcript order form; reviewing appellate and district court rules and transcript instructions re transcripts; filing transcript order form at both court of appeals and district court; sending copy to court reporter; reviewing filings	1	18	1.3	\$455.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/15/2023	Gilliam, Matt B	Communicating with Court clerk and SWA appellate counsel re cross appeals	0	42	0.7	\$245.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
06/16/2023	Gilliam, Matt B	Reviewing districting court docket re ordering and filing of transcript	0	6	0.1	\$35.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
07/07/2023	Gilliam, Matt B	Reviewing appellate docket re clerk request for record on appeal from district court (.2); reviewing district court filings re electronic record on appeal and Local 556 trial exhibit filings (.8); communications with Andrew Ryan and co counsel MDH re sanctions hearing exhibits (.1)	1	6	1.1	\$385.00	0.1	\$35.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

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07/12/2023	Gilliam, Matt B	Preparing for show cause hearing; reviewing notes from prior hearing (.9); reviewing outline to address legal impact of evidence elicited (.7); reviewing and analyzing transcript of first session of show cause hearing (2.4)	4	0	4	\$1,400.00	4	\$1,400.00	
07/13/2023	Gilliam, Matt B	Reviewing and analyzing transcript of first session of show cause hearing	3	30	3.5	\$1,225.00	3.5	\$1,225.00	
07/14/2023	Gilliam, Matt B	Reviewing and analyzing transcript of first session of show cause hearing (2.0); reading Court orders re SWA counsel pro hac requests (.1); revamping outline and planning closing arguments re impact of testimony at show cause hearing on evidence (3.4); [REDACTED] (.3)	5	48	5.8	\$2,030.00	5.5	\$1,925.00	n/c- all redacted unrelated to motion-to-compel or motion-for-contempt proceedings
07/17/2023	Gilliam, Matt B	Outlining and planning closing arguments re impact of testimony at show cause hearing on evidence	7	54	7.9	\$2,765.00	7.9	\$2,765.00	
07/18/2023	Gilliam, Matt B	Traveling to Dallas for show cause hearing (8.0); outlining and preparing arguments re testimony and evidence for show cause hearing (2.6)	10	36	10.6	\$3,710.00	2.6	\$910.00	n/c- 8.0 hours for travel
07/19/2023	Gilliam, Matt B	Outlining and preparing arguments re testimony and evidence for show cause hearing	8	36	8.6	\$3,010.00	8.6	\$3,010.00	
07/20/2023	Gilliam, Matt B	Outlining and preparing arguments re testimony and evidence for show cause hearing (1.0); attending show cause hearing (7.2); meeting with client re show cause hearing following hearing (2.8)	11	0	11	\$3,850.00	11	\$3,850.00	
07/21/2023	Gilliam, Matt B	Traveling back to Virginia from hearing in Dallas	9	12	9.2	\$3,220.00	0	\$0.00	n/c- 9.2 hours for travel
07/24/2023	Gilliam, Matt B	Outlining issues on appeal	0	12	0.2	\$70.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
07/25/2023	Gilliam, Matt B	Communicating with client and co counsel MLC re case and appellate proceedings	2	48	2.8	\$980.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
07/26/2023	Gilliam, Matt B	Reviewing court order re electronic record on appeal	0	6	0.1	\$35.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

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07/31/2023	Gilliam, Matt B	Reviewing appellate rules and instructions re EROA review and briefing deadlines	0	18	0.3	\$105.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/02/2023	Gilliam, Matt B	Reviewing electronic record on appeals for completeness and omissions	8	12	8.2	\$2,870.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/03/2023	Gilliam, Matt B	Reviewing electronic record on appeals for completeness and omissions (3.0); reviewing court of appeals correspondence re briefing notice (.7); reviewing transcripts added to EROA (.8)	4	30	4.5	\$1,575.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/04/2023	Gilliam, Matt B	Reviewing electronic record on appeal (1.4); reviewing district court refiling of trial exhibit 42 (.3)	1	42	1.7	\$595.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/07/2023	Gilliam, Matt B	Reviewing and analyzing court order re sanctions (3.3); discussing decision and order with client (1.2); outlining motion for sanctions fees, expenses, and costs (.3); reviewing MBG time entries related to contempt proceedings to prepare exhibit (.5)	5	18	5.3	\$1,855.00	0.8	\$280.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/08/2023	Gilliam, Matt B	Preparing MBG time entries exhibit for sanctions fees petition (.7); preparing Foundation exhibits, bill of costs, and itemized bill of costs attachment (3.6); analyzing filing planning and communicating with co counsel re same (.8); [REDACTED] [REDACTED] (1.1); [REDACTED] (.7)	6	54	6.9	\$2,415.00	5.1	\$1,785.00	n/c- all redacted unrelated to motion-to-compel or motion-for-contempt proceedings

08/09/2023	Gilliam, Matt B	Outlining contents for bill of costs and separating expenses (.9); reviewing reasonableness issues and factors to consider with time entries (.5); reviewing and preparing outline of sanctions fees motion brief (.2); preparing bill of costs and itemized bill of costs attachment (.6); phone call with MDH re sanctions fees motion, supporting materials needed, and timing of filing the motion and bill of costs (.3); preparing MBG affidavit (1.0); preparing template for BGP affidavit (.1); conversation with BGP re appeal (.6); outlining materials needed for sanctions fees petition (.1); drafting sanctions proof of fees brief (1.0); [REDACTED] [REDACTED] (.8); [REDACTED] (1.7); [REDACTED] (1.2)	9	0	9	\$3,150.00	4.7	\$1,645.00	n/c- all redacted entries and entries not in bold unrelated to motion-to-compel or motion-for-contempt proceedings
08/10/2023	Gilliam, Matt B	[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	9	36	9.6	\$3,360.00	0	\$0.00	n/c- all redacted unrelated to motion-to-compel or motion-for-contempt proceedings
08/11/2023	Gilliam, Matt B	[REDACTED] [REDACTED] [REDACTED] [REDACTED]	1	54	1.9	\$665.00	0	\$0.00	n/c- all redacted unrelated to motion-to-compel or motion-for-contempt proceedings
08/14/2023	Gilliam, Matt B	Drafting, reviewing, revising proof of sanctions fees brief (3.7); reviewing expenses exhibit for sanctions fees motion (.1); reviewing Pryor and Bruce expenses, costs, and invoices, and preparing email to MDH with questions about related expenses, costs, and invoices (2.7); reviewing court of appeals docket (.1); reviewing and revising MBG and BGP affidavits and materials for exhibits to affidavits (1.6)	8	12	8.2	\$2,870.00	8.1	\$2,835.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings

08/15/2023	Gilliam, Matt B	Reviewing and analyzing SWA request for administrative stay and stay of contempt order pending appeal and analyzing same with co counsel (2.8); phone call to MDH re SWA request (.3); preparing and revising sanctions fees brief (.7) ; drafting response to SWA email request re Carter position on administrative stay and stay pending appeal (.7); researching and reviewing authority re response to SWA motion to stay pending appeal (3.2); drafting and revising response opposition to SWA motion for stay pending appeal (2.4)	10	6	10.1	\$3,535.00	0.7	\$245.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/16/2023	Gilliam, Matt B	Revising response brief for SWA sanctions stay request (5.0); revising case law and argument structure for response brief for SWA sanctions stay request (.6); preparing proposed order (.2) and appendix cover sheet (.2) for sanctions fees petition; reviewing MDH edits to sanctions fees petition (.3); preparing exhibits for bill of costs (.4); reviewing correspondence with MDH re sanctions fee petition materials (.4) ; reviewing and analyzing SWA motion to stay sanctions order (2.3)	9	24	9.4	\$3,290.00	1.5	\$525.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/17/2023	Gilliam, Matt B	Reviewing and analyzing SWA motion for stay and outlining responsive arguments (10.3); phone call with client re case developments (.1); researching case law re contempt appeal (1.7)	12	6	12.1	\$4,235.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/18/2023	Gilliam, Matt B	Reviewing and evaluating position on SWA consolidation and page limit extension request (4.5); Outlining and drafting responsive arguments for response to SWA motion for stay (8.3)	12	48	12.8	\$4,480.00	0	\$0.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/19/2023	Gilliam, Matt B	Communications with local counsel BGP re SWA consolidation and page limit extension request (.3); Drafting response brief arguments for response to SWA motion for stay (5.2); reviewing local counsel affidavits and appendix exhibits for sanctions fees petition (1.6); revising proposed order, appendix, and affidavits (.3), and brief (2.8) for fees petition	10	12	10.2	\$3,570.00	4.7	\$1,645.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/20/2023	Gilliam, Matt B	Drafting and revising response to SWA stay request (6.2); reviewing and revising MBG sanctions fees exhibit (2.6); reviewing and revising MBG affidavit for fees exhibit (.7); preparing redactions (.3); organizing and preparing all petition materials and exhibits for filing (1.6)	11	24	11.4	\$3,990.00	5.2	\$1,820.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
08/21/2023	Gilliam, Matt B	Preparing response and responding to SWA request re consolidation of appeals and discussing same with MLC (.8); reviewing sanctions fees exhibit redactions (.1); adding citations to sanction fees petition brief and proofreading brief (2.4)	3	18	3.3	\$1,155.00	2.5	\$875.00	n/c- all entries not in bold and unrelated to motion-to-compel or motion-for-contempt proceedings
Totals:			532	2334	571	\$199,815.00	342.1	\$119,735.00	

EXHIBIT 2

Date	Amount	Amount Sought	Type	Vendor	Description	File Name
05/17/2023	\$359.90	\$359.90	Airline Expenses	Gilliam, Matt B	American Airlines - DFW to IND return trip from Dallas TX for Southwest show cause hearing for sanctions	Carter, Charlene
05/17/2023	\$383.90	\$383.90	Airline Expenses	Gilliam, Matt B	American Airlines - DCA to DFW airport in Dallas TX for Southwest show cause hearing for sanctions	Carter, Charlene
05/20/2023	\$30.00	\$30.00	Airline Expenses	Gilliam, Matt B	American Airlines - MBG bag fees for DCA to DFW traveling to Dallas for Carter show cause SW sanctions hearing	Carter, Charlene
05/21/2023	\$33.71	\$33.71	Mileage/Transportation	Gilliam, Matt B	Uber - MBG Uber from home in Alexandria, VA for flight to Dallas/Ft. Worth TX for Carter show cause hearing in Dallas, TX	Carter, Charlene
05/21/2023	\$49.88	\$49.88	Mileage/Transportation	Gilliam, Matt B	Uber - MBG Uber from DFW airport in Dallas/Ft. Worth TX to hotel in Dallas, TX for Carter show cause hearing in Dallas, TX	Carter, Charlene
05/21/2023	\$58.91	\$58.91	Food Expenses	Gilliam, Matt B	Revolver Taco Lounge - MBG meal while attending and preparing for Carter show cause hearing in Dallas, TX	Carter, Charlene
05/22/2023	\$33.43	\$33.43	Food Expenses	Gilliam, Matt B	Trompo - MBG meal while attending and preparing for Carter show cause hearing in Dallas, TX	Carter, Charlene
05/22/2023	\$33.47	\$33.47	Food Expenses	Gilliam, Matt B	Mister 01 - MBG meal while attending and preparing for Carter show cause hearing in Dallas, TX	Carter, Charlene
05/23/2023	\$646.05	\$646.05	Hotel Expenses	Gilliam, Matt B	Homewood Suites - MBG lodging while attending Carter show cause SW sanctions hearing	Carter, Charlene
05/24/2023	\$48.63	\$48.63	Mileage/Transportation	Gilliam, Matt B	Uber - MBG Uber from Dallas, TX hotel to DFW airport after Carter show cause hearing in Dallas, TX	
05/24/2023	\$30.00	\$30.00	Airline Expenses	Gilliam, Matt B	American Airlines - MBG bag fees for DFW to IND returning from Carter show cause SW sanctions hearing	Carter, Charlene
06/19/2023	\$429.80	\$429.80	Airline Expenses	Gilliam, Matt B	American Airlines - travel to DFW from DCA	Carter, Charlene
07/17/2023	\$30.00	\$30.00	Airline Expenses	Gilliam, Matt B	American Airlines - MBG bag fees for DCA to DFW traveling to Dallas for continuation of Carter show cause Southwest sanctions hearing	Carter, Charlene
07/18/2023	\$4.62	\$4.62	Food Expenses	Gilliam, Matt B	Dunkin Donuts (The Grove-Washington) - MBG coffee while traveling from DCA to Dallas, TX for continuation of Southwest sanctions hearing	Carter, Charlene
07/18/2023	\$34.98	\$34.98	Mileage/Transportation	Gilliam, Matt B	MBG Uber from home in Alexandria, VA to DCA for flight to Dallas TX for Carter continuation of show cause hearing	Carter, Charlene
07/18/2023	\$56.13	\$56.13	Mileage/Transportation	Gilliam, Matt B	MBG Uber from DFW airport to Dallas TX hotel for Carter continuation of show cause hearing	Carter, Charlene
07/18/2023	\$36.13	\$36.13	Food Expenses	Gilliam, Matt B	Mi Pueblito Taqueria - MBG meal while preparing for Carter continuation of show cause hearing in Dallas, TX	Carter, Charlene

07/19/2023	\$35.53	\$35.53	Food Expenses	Gilliam, Matt B	Mister 01- MBG meal while preparing for Carter continuation of show cause hearing in Dallas, TX	Carter, Charlene
07/21/2023	\$53.52	\$53.52	Food Expenses	Gilliam, Matt B	Pappasito's Cantina - MBG meal while traveling from Dallas/Ft. Worth TX back to DC from continuation of Carter show cause Southwest sanctions hearing	Carter, Charlene
07/21/2023	\$683.79	\$683.79	Hotel Expenses	Gilliam, Matt B	Homewood Suites - MBG lodging in Dallas, TX while attending continuation of Carter show cause Southwest sanctions hearing	Carter, Charlene
07/21/2023	\$30.00	\$30.00	Airline Expenses	Gilliam, Matt B	American Airlines - MBG bag fees for DFW to IAD returning from continuation of Carter show cause Southwest sanctions hearing	Carter, Charlene
07/21/2023	\$51.17	\$51.17	Mileage/Transportation	Gilliam, Matt B	MBG Uber from Dallas TX hotel to DFW airport after Carter continuation of show cause hearing	Carter, Charlene
07/21/2023	\$41.17	\$41.17	Mileage/Transportation	Gilliam, Matt B	MBG Uber from home in Alexandria VA form DCA airport after Carter continuation of show cause hearing	Carter, Charlene

TOTAL \$3,194.72 \$3,194.72